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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 CHARLOTTE BOWNES; JOSEPH
17 LAGRECA; JESSICA NAUMANN; and
CHRISTOPHER GOODIN, individually and
on behalf of all others similar situated,

Plaintiffs.

V.

20 INTERNATIONAL GAME TECHNOLOGY
21 PLC; MGM RESORTS INTERNATIONAL;
22 BALLY'S CORPORATION; PENN
ENTERTAINMENT, INC.; STATION
CASINOS, LLC.

Defendants.

Case No.: 3:24-cv-00528-ART-CSD

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT [ECF NO. 1]**

(FIRST REQUEST)

1 Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and
2 Christopher Goodin, on one hand, and Defendant International Game Technology, PLC¹, on the
3 other hand, by and through their respective undersigned attorneys of record (collectively, the
4 “Parties”), hereby stipulate and agree subject to the Court’s approval to extend time for defendants
5 to respond to the Complaint (ECF No. 1). The current deadline for Defendant International Game
6 Technology, PLC is December 16, 2024. This is the first request for extension concerning this
7 deadline.

- 8 1. On November 21, 2024, Plaintiffs filed their Complaint (ECF No. 1) against defendants,
9 including Defendant International Game Technology, PLC (Defendant).
- 10 2. On November 25, 2024, Plaintiffs mailed a copy of the Complaint and Summons to a
11 registered agent associated with Defendant (ECF No. 11).
- 12 3. The current deadline for Defendant to respond to the Complaint (ECF No. 1) is
13 December 16, 2024.
- 14 4. Defendant contacted Plaintiffs to discuss its position that International Game
15 Technology, PLC is an improperly named party. Defendant also indicated that other
16 defendants share a similar concern.
- 17 5. Through this conferral process, Plaintiffs stated that they intend to amend the complaint
18 to add additional parties and defendants.
- 19 6. Subject to the Court’s approval, the Parties have agreed that all defendants shall have
20 an additional forty-five (45) days to respond to the Complaint (ECF No. 1).
- 21 7. During the requested extension, the parties intend to confer regarding the named
22 defendants and anticipate the filing of an amended complaint. The Parties will confer
23 regarding the filing of any amended complaint and a proposed briefing schedule.
- 24 8. Good cause exists to grant this stipulation and it is submitted in good faith, is not
25 interposed for delay, and is not filed for an improper purpose.

26
27
28 ¹By entering into this stipulation, Defendant International Game Technology PLC does not waive any arguments
related to service of process, jurisdiction or any initial motion defenses.

1 DATED: December 16, 2024

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1 DATED: December 16, 2024

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27 IT IS SO ORDERED.

28 UNITED STATES DISTRICT JUDGE /
 29 UNITED STATES MAGISTRATE JUDGE
 30 Dated: